

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IULAI MIKAELE,

Defendant.



Oct 13 2021

No. 3:21-mj-531-MMS

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Dale Boothroyd, having been first duly sworn, do hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a criminal complaint and arrest warrant pursuant to Federal Rules of Criminal Procedure 3 and 4. As explained more fully below, I have probable cause to believe that IULAI MIKAELE has committed the a federal criminal offense, in that on or about October 9, 2021, within the District of Alaska , IULAI MIKAELE knowingly possessed controlled substances with intent to distribute, which controlled substances included 50 grams or more of pure methamphetamine and 100 grams or more of a mixture and substances containing a detectible amount of heroin, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A), (B).

2. The statements in this affidavit are based in part on information provided to me by other law enforcement officers, police reports, my own investigation of this matter, and my training and experience. Since this affidavit is being submitted for the limited purpose of establishing probable cause to support a complaint and securing an arrest warrant, I have



Oct 13 2021

not included each and every fact known to me concerning this investigation.

3. I am a police officer with the Anchorage International Airport Police/Fire Department, and have been assigned as a Task Force Officer with the Drug Enforcement Administration since October 2018.. During the course of my law enforcement career, I have written and/or executed numerous search and seizure warrants for narcotics, dangerous drugs, and related records, and assisted in the seizure of hundreds of thousands of dollars in proceeds and/or assets derived from such illegal activity. During the course of my employment as a law enforcement officer, I have gained experience in conducting drug investigations and have received the benefit of many years of such experience of fellow agents, investigators and officers.

4. During the course of my employment with these three agencies, I have worked in an undercover capacity and conducted investigations of controlled substances violations in conjunction with agents, investigators and officers from other jurisdictions. I have also worked with and conducted investigations utilizing confidential sources. I have also conducted or assisted in investigations which have led to the arrest and conviction of persons for violations dealing with the sale, possession and/or manufacture of controlled substances, and the seizure and forfeiture of assets. As part of these investigations, I have been able to interview arrested subjects and their associates. Through these interviews, your Affiant has learned how and why these offenders conduct various aspects of their drug trafficking activities, to include communicating, manufacturing, packaging, distribution, transportation

U.S. v. Mikaele  
3:21-mj-531-MMS

Page 2 of 5



Oct 13 2021

5. I attended the Alaska Law Enforcement Training Academy #12-02 and received 947 hours of training. I obtained my Intermediate Police Certificate from the Alaska Police Standards Council. I have attended a 40 hour "Jetway" training course presented by the Drug Enforcement Administration and El Paso Intelligence Center. I have attended a 40 hour Task Force Officer School administered by the Drug Enforcement Administration in Quantico, VA. I have attended a 40 hour "Undercover Survival and Tactics" course presented by the Midwest Counterdrug Training Center. I have also attended a 7 hour course on Drugs in Alaska at the State Crime Laboratory. I have obtained an A.A.S degree from Finger Lakes Community College, graduating in 2009 with a major in Conservation Law Enforcement.

#### **FACTS ESTABLISHING PROBABLE CAUSE**

6. Federal law enforcement agencies, including the DEA, have been investigating the importation of narcotics into the District of Alaska via packages sent through United Parcel Service (UPS). In connection with that investigation, agents established physical surveillance in the area of 700 E. Northern Lights Boulevard in Anchorage, Alaska on October 9, 2021.

7. During this surveillance, agents observed a male carrying two backpacks approaching a Chevrolet Equinox bearing Alaska license plate JDR-975. This male opened the rear passenger door and left the backpacks in the vehicle. Based upon my training and experience, this behavior is consistent with a delivery of narcotics for further distribution.

8. Agents maintained visual observation of the Chevrolet Equinox and stopped it.

U.S. v. Mikaele  
3:21-mj-531-MMS

Page 3 of 5



Oct 13 2021

There were two males inside the vehicle. The passenger was identified as IULAI MIKAELE.

9. Agents searched the vehicle and recovered what, based on my training and experience, appeared to be controlled substances, specifically methamphetamine and heroin. The gross weight of the methamphetamine was approximately 89 grams and the gross weight of the heroin was approximately 144.8 grams.

10. Based on my training and experience in investigating methamphetamine trafficking in the District of Alaska, and the purity of methamphetamine seized as determined by forensic laboratory analysis, I believe that methamphetamine with a gross weight of 89 grams would contain more than 50 grams of pure methamphetamine.

11. Based on my training and experience, the quantities of controlled substances seized from the Chevrolet Equinox are consistent with possession for purposes of further distribution and sale, and are not consistent with possession for personal use or consumption.

## **CONCLUSION**

12. I have probable cause to believe that MIKAELE has committed the offenses described in the complaint. Accordingly, I ask the court to issue a warrant for MIKAELE's arrest in accordance with Federal Rule of Criminal Procedure 4(a).

RESPECTFULLY SUBMITTED,

U.S. v. Mikaele  
3:21-mj-531-MMS

Page 4 of 5



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Dale Boothroyd  
Task Force Officer, DEA

ATTESTED TO in accordance with Fed. R. Crim. P. 4.1 on October 13, 2021.



Matthew Scoble

United States Magistrate Judge

Digitally signed by  
Matthew Scoble  
Date: 2021.10.13  
16:03:30 -08'00'